

EXHIBIT 4

WHITE & CASE

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December 30, 2008

VIA FIRST CLASS MAIL & E-MAIL

Steven U. Ross, Esq.
Deputy Attorney General
Bureau of Medi-Cal Fraud and Elder Abuse
Office of the Attorney General
California Department of Justice
1455 Frazee Road, Suite 315
San Diego, California 92108

Re: State of California, ex rel. Ven-A-Care v. Abbott Labs., Inc., et al.,
Case No. 03-CV-11226-PBS, MDL No. 1456 (D. Mass.)

Dear Steven:

We are in receipt of your letter to Michael Gallagher dated December 19, 2008. While your letter purports to request the identity of Sandoz's designated Rule 30(b)(6) witness(es) and proposed deposition dates, it also acknowledges that you have received our November 13, 2008 objections to the State of California's inappropriate and overly broad 30(b)(6) deposition topics (with the exception of Topic No. 5, for which Sandoz already has provided the testimony of a corporate designee, see below). We disagree with your characterization of these objections as "boilerplate" and invite you to delineate their insufficiencies should you continue to wish to pursue corporate designee testimony on Topics 1-4 and Topic 6. As such we stand by the November 13 objections and are, therefore, unable to provide you with identities of designated witnesses or deposition dates for those topics.

With respect to Topic No. 5 (the data topic), as you are aware, Nancy Clapper, the witness Sandoz designated for virtually identical corporate designee topics in the Texas AWP case, testified on December 10, 2008. You attended that deposition on behalf of the State of California and had a full and fair opportunity to question Ms. Clapper on matters relating to Topic No. 5 at that time.

ALMATY ANKARA BANGKOK BEIJING BERLIN BRATISLAVA BRUSSELS BUDAPEST DRESDEN DÜSSELDORF FRANKFURT HAMBURG
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Steven U. Ross, Esq.

December 30, 2008



If you have any questions, please feel free to contact me.

Happy New Year.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heather K. McDevitt".

Heather K. McDevitt